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Attorneys for Debtors and Reorganized Debtors

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

PACIFIC GAS AND ELECTRIC COMPANY,

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case, No. 19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**DECLARATION OF CHRISTINA PULLO IN
SUPPORT OF REORGANIZED DEBTORS'
SECOND SECURITIES CLAIMS OMNIBUS
OBJECTION (AMENDED AND SUPERSEDED
CLAIMS)**

**Response Deadline:
April 14, 2021, 4:00 p.m. (PT)**

Hearing Information If Timely Response Made:

Date: April 28, 2021

Time: 10:00 a.m. (Pacific Time)

Place: (Telephonic Appearances Only)

United States Bankruptcy Court

Courtroom 17, 16th Floor

San Francisco, CA 94102

1 I, Christina Pullo, pursuant to section 1746 of title 28 of the United States Code, hereby declare
2 under penalty of perjury that the following is true and correct to the best of my knowledge, information,
3 and belief:

4 1. I am a Vice President at Prime Clerk LLC (“**Prime Clerk**”). Prime Clerk was appointed
5 as the claims and noticing agent and administrative advisor to PG&E Corporation and Pacific Gas and
6 Electric Company, as debtors and reorganized debtors (collectively, the “**Debtors**” or the “**Reorganized**
7 **Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”). I submit this declaration
8 in support of the *Reorganized Debtors’ Second Securities Claim Omnibus Objections (Amended and*
9 *Superseded Claims)* (the “**Omnibus Objection**”),¹ filed contemporaneously herewith.

10 2. In my current position, I am responsible for, among other things, supervising the Prime
11 Clerk team in the work we are conducting at the direction of the Reorganized Debtors to assist the
12 Reorganized Debtors, their advisors, and their counsel in analyzing Securities Claims filed in these
13 Chapter 11 Cases. At this moment, Prime Clerk is assisting the Reorganized Debtors and their counsel
14 in identifying claims to be included in the Omnibus Objection.

15 3. Except as otherwise indicated herein, all facts set forth in this declaration are based upon
16 my personal knowledge, the knowledge of other Prime Clerk employees working under and alongside
17 me on this matter, my discussions with the Reorganized Debtors’ personnel and the Reorganized
18 Debtors’ various advisors and counsel, and my review of relevant documents and information. If called
19 upon to testify, I would testify competently to the facts set forth in this declaration. I am authorized to
20 submit this declaration on behalf of the Reorganized Debtors.

21 **The Amended and Superseded Claims**

22 4. The Prime Clerk team, under my general supervision, has been actively involved in the
23 review and reconciliation of the Proofs of Claim filed in the Chapter 11 Cases. Prime Clerk maintains a
24 claims database and, at the request of and in coordination with the Reorganized Debtors and their
25 counsel, has been reviewing and reconciling the Proofs of Claim asserting transactions in the Debtors’
26 securities. As part of this review and reconciliation process, the Prime Clerk team, working with the

27 ¹ Capitalized terms used but not otherwise defined herein have the meanings ascribed to such terms in
28 the Omnibus Objection.

1 Reorganized Debtors' other professionals, has identified a number of filed Proofs of Claim that are
2 obsolete (the "**Amended and Superseded Claims**") because the applicable Claimant has filed one or
3 more amended or subsequent Proof of Claim Forms (the "**Surviving Claims**"). Each Surviving Claim,
4 either on its face or in the attachments thereto, appears to express the Claimant's intention to amend and
5 supersede the earlier-filed claim.

6 5. Based on our review of the Amended and Superseded Claims, the Surviving Claims, and
7 our records, Prime Clerk confirms that **Exhibit 1** to the Omnibus Objection correctly identifies the
8 Amended and Superseded Claims and their corresponding Surviving Claims in the columns headed
9 "Claims To Be Disallowed and Expunged" and "Surviving Claim(s)," respectively. There is a Surviving
10 Claim for each asserted Amended and Superseded Claim that is the subject of the Omnibus Objection.

11
12 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and
13 correct to the best of my knowledge, information, and belief.

14
15 Executed March 17, 2021 in New York.

16 /s/ Christina Pullo
17 Christina Pullo
18 Vice President
19 Prime Clerk LLC
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